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AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
BY DEPUTYUNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON**22-CV-5038** PSL

Corrina Markley

CASE NO. _____
[to be filled in by Clerk's Office]COMPLAINT FOR VIOLATION
OF CIVIL RIGHTS
(for use only by plaintiffs not in
custody)

Plaintiff(s),

v.

Jury Trial: ☒ Yes ☐ No

City of Seattle,

Jenny Durkan, Former Mayor

Debra Smith, et al.

Defendant(s).

I. THE PARTIES TO THIS COMPLAINT**A. Plaintiff(s)***Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.*Name Corrina MarkleyStreet Address 3715 N 25th StreetCity and County Tacoma, Pierce CountyState and Zip Code Washington 98406Telephone Number 253-761-9166

PAC #: 9A106305 SUMM/1965

Defendants List

1. City of Seattle, A Municipal Corporation
2. Jenny Durkan, Former Mayor of Seattle
3. Debra Smith, GM/CEO Seattle City Light
4. DaVonna Johnson
5. Phil West
6. Jackie Smith

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1 B. Defendant(s)

2 Provide the information below for each defendant named in the complaint, whether the
 3 defendant is an individual, a government agency, an organization, or a corporation. For an
 4 individual defendant, include the person's job or title (if known). Attach additional pages if
 5 needed.

6 Defendant No. 1

7 Name City of Seattle, A Municipal Corporation

8 Job or Title (if known) Seattle City Light [department]

9 Street Address 700 5th Ave., Suite 3200

10 City and County Seattle, King County

11 State and Zip Code Washington 98104

12 Telephone Number (206) 684-3000

13 ☐ Individual capacity ☐ Official capacity

14 Defendant No. 2

15 Name Jenny Durkan

16 Job or Title (if known) Former Mayor of Seattle

17 Street Address last known: 600 4th Ave, 7th floor

18 City and County Seattle, King County

19 State and Zip Code Washington 98104

20 Telephone Number (206) 684-4000

21 ☐ Individual capacity ☒ Official capacity

22 Defendant No. 3

23 Name Debra Smith

24 Job or Title (if known) GM/CEO Seattle City Light

Street Address 700 5th Avenue, Suite 3200

City and County Seattle, King County

State and Zip Code Washington 98104

Telephone Number (206) 684-3000

☐ Individual capacity ☒ Official capacity

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Defendant No. 4

Name DaVonna JohnsonJob or Title (*if known*) Human Resources - OfficerStreet Address 700 5th Ave, Suite 3400City and County Seattle, King CountyState and Zip Code Washington, 98104Telephone Number (206) 684-3000☐ Individual capacity ☒ Official capacity**II. PREVIOUS LAWSUITS**

Have you brought any other lawsuits in any federal court in the United States:?

☐ No☒ YesIf yes, how many? 3

Describe the lawsuit:

All lawsuits represent Social Security appeals.

Parties to this previous lawsuit:

Corrina Markley and Social Security Commissioner

Plaintiff(s)

Corrina Markley, Appellant

Defendant No. 5

Name Phil West
Job or Title (if known) Customer Service & Energy Delivery Officer
Street Address (last known business address)
700 5th Ave, Suite 2800
City and County Seattle, King County
State and Zip Code WA, 98104
Telephone Number (206) 684-3000
☐ Individual capacity ☒ Official capacity

Defendant No. 6

Name Jackie Smith
Job or Title (if known) Supervisor
Street Address (last known business address)
700 5th Ave, Suite 2800
City and County Seattle, King County
State and Zip Code WA, 98104
Telephone Number (206) 684-3000
☐ Individual capacity ☒ Official capacity

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Defendant(s)

Commissioner of Social Security, Appellee

(If there is more than one previous lawsuit, describe the additional lawsuits on another piece of paper using the same outline. Attach additional sheets, if necessary)

Court and name of district:

US District Court, Western District of Washington

Docket Number: 3:17-cv-5975-JRC

Assigned Judge: J Richard Creatura

Disposition: (For example, was the case dismissed as frivolous or for failure to state a claim? Was it appealed? Is it still pending?)

The disposition was the judge issued an order for remand back to the ALJ.

Approximate filing date of lawsuit: 11/22/2017

Approximate date of disposition: 9/25/18

III. BASIS FOR JURISDICTION

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens*

Court and name of district: US District Court, Western District of Washington

Docket Number: 3:20-cv-05058-MAT

Assigned Judge: Mary Alice Theiler

Disposition: The judge affirmed the ALJ's decision of onset of disability.

Approximate filing date of lawsuit: 1/21/2020

Approximate date of disposition: 9/17/2020

Court and name of district: US Court of Appeals, 9th Circuit - San Francisco

Docket Number: 20-35956

Assigned Judge: ?

Disposition: Still pending

Approximate filing date of lawsuit: 11/05/2020

Approximate date of disposition: pending

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1 v. *Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may
2 sue federal officials for the violation of certain constitutional rights.

3 A. Are you bringing suite against (*check all that apply*):

4 ☐ Federal officials (a *Bivens* claim)

5 ☐ State or local officials (a § 1983 claim)

6 B. Section 1983 allows claims alleging the "deprivation of any rights, privileges, or
7 immunities secured by the Constitution and [federal laws]." 42 U.S.C. § 1983. If you are
8 suing under section 1983, what federal constitutional or statutory right(s) do you claim
9 is/are being violated by state or local officials?

10 n/a
11
12
13

14 C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional
15 rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are
16 being violated by federal officials?

17 n/a
18
19
20

21 D. Section 1983 allows defendants to be found liable only when they have acted "under
22 color of any statute, ordinance, regulation, custom, or usage, of any State or Territory
23 or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983,
24 explain how each defendant acted under color of state or local law. If you are suing

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under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

IV. STATEMENT OF CLAIM

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

See attached Statement of Claim and Facts.

A. Where did the events giving rise to your claim(s) occur?

Seattle City Light

B. What date and approximate time did the events giving rise to your claim(s) occur?

June, 2014 - March 18, 2019

C. What are the facts underlying your claim(s)? (For example: What happened to you?

Who did what? Was anyone else involved? Who else saw what happened?)

See attached Statement of Claim and Facts.

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1
2 **V. INJURIES**

3 *If you sustained injuries related to the events alleged above, describe your injuries and state*
4 *what medical treatment, if any, you required and did or did not receive.*

5 **See attached Statement of Injuries.**
6
7
8

9 **VI. RELIEF**

10 *State briefly what you want the court to do for you. Make no legal arguments. Do not cite any*
11 *cases or statutes. If requesting money damages, include the amounts of any actual damages*
12 *and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.*

13 **I am requesting relief in money damages in the amount of**
14

15 **\$26,000,000. (Exhibit 7)**
16
17

18 **VII. CERTIFICATION AND CLOSING**

19 Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my
20 knowledge, information, and belief that this complaint: (1) is not being presented for an improper
21 purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;
22 (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or
23 reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so
24 identified, will likely have evidentiary support after a reasonable opportunity for further
investigation or discovery; and (4) the complaint otherwise complies with the requirements of
Rule 11.

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1 I agree to provide the Clerk's Office with any changes to my address where case-related
2 papers may be served. I understand that my failure to keep a current address on file with the
3 Clerk's Office may result in the dismissal of my case.

Date of signing:

1-13-2022

Signature of Plaintiff

Corrina Markley

Printed Name of Plaintiff

Corrina Markley

Date of signing:

Signature of Plaintiff

Printed Name of Plaintiff

Date of signing:

Signature of Plaintiff

Printed Name of Plaintiff

Corrina Markley
3715 N 25th St
Tacoma, WA 98406

CERTIFIED MAIL



7020 1250 0000 4374 2915



1000



98101

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U.S. District Court
700 Stewart St., Suite 2310
Seattle, WA 98101

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AT SEATTLE
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WESTERN DISTRICT OF WASHINGTON
BY

RETURN RECEIPT
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